the production or marketplace environment can only be described as naive. No testing can truly mimic an actual production environment because new scenarios continually emerge and human inventiveness cannot anticipate them all.

To the contrary, there is every reason -- including the demonstrable failure of Ameritech's limited trials with MCI -- to suspect that, when resale is truly up and running, Ameritech's OSS will encounter new problems for which it is not prepared and in the face of which even the best-designed systems -- which Ameritech's are not -- will default and err. The risk that such errors would impose substantial pecuniary and reputational harm upon new entrants is, in my opinion, great. Moreover, if Ameritech has already been permitted to provide long distance service by that time, regulators will have little leverage to ensure that the OSS systems are corrected.

Maintenance and Repair

Q: **What is your opinion of Ameritech's OSS systems for maintenance and repair in the resale arena?**

A: Ameritech uses the same ANSI-accredited electronic bonding interface for maintenance and repair functions for resale as it does for unbundled elements. As I mentioned earlier, the interface is appropriate but it is impossible to determine from the information submitted by Ameritech to date whether such systems are operationally ready. Ameritech has generally confirmed that its resale customers continue to use a manual interface for their maintenance and repair requests. In that

event, the mere fact that Ameritech has successfully used its EB interface for access services is an insufficient basis on which to conclude that its maintenance and repair systems and interfaces are truly ready to support local service resale, as discussed above.

Billing

Q: **Please discuss Ameritech's plan to provide resale billing information to its CLEC customers.**

A: Ameritech purports to use EMR for daily usage reports and its own Ameritech Electronic Billing System ("AEBS") for monthly bills. In neither respect is Ameritech's proposal adequate.

EMR is the appropriate interface for the communication of usage feeds. However, in trials with MCI, Ameritech has provided header and trailer records in EMI format. EMI format, which is used for interexchange carrier messages, should not be used for local exchange messages. The EMI record provides less call/recording detail than is sufficient for business purposes, and less than do the EMR formats.

Use of AEBS for monthly billing is flatly unacceptable. The industry standard is a specification of CABS called Billing Output Specifications. As a preliminary matter, use of AEBS instead imposes excessive and unjustified costs on those new entrants that are already using CABS for access billing in Ameritech's

region and that require a uniform national standard for national operations. Moreover, while MCI has expended considerable time and money adopting our systems to accommodate AEBS, still Ameritech has not provided us all the information we need to complete the task. In particular, Ameritech does not electronically support all the AEBS tables outlined in its Implementation Guide and has not been consistently supplementing its AEBS table information for all its local services. Some of the critical information Ameritech has failed to provide includes the Customer Service Record and calling plan or local usage detail. Without this information, MCI cannot audit its bills in a minimally acceptable manner.

Once again, however, the problems with Ameritech's OSS systems are not limited to its choice of interface. Rather, MCI's experience belies Ameritech's assertions elsewhere that all orders have been properly billed and that CLECs have received all necessary bill detail. The first bill we received from Ameritech for resold lines was riddled with errors. First, it was in CRIS format -- a format that, unlike CABS or even AEBS, provides no usage-sensitive data and is entirely un-auditable. The bill contains no call detail and does not even specify the billing period. Ameritech recognizes that its use of CRIS was erroneous, but has not yet explained how this error occurred. Furthermore, the details that did appear were egregiously wrong. For example, various charges were inconsistent with the tariffed rates. Also, Ameritech charged MCI for services not ordered and charged us for twice the quantity of most services we did order.

Miller-S

BEFORE THE
ILLINOIS COMMERCE COMMISSION

In the Matter of Illinois Commerce Commission	)	
Investigation concerning Illinois Bell Telephone Company compliance with Section 271(c) of the Telecommunications Act	)	Docket No. 96-0404

SUPPLEMENTAL DIRECT TESTIMONY OF ALI MILLER
ON BEHALF OF MCI TELECOMMUNICATIONS CORPORATION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Ali Miller. I am employed by MCI with responsibility as Market Manager for local service in the Ameritech region. My business address is 707 17th St., Denver, CO, 80202

Q: PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A: I am responsible for coordinating all activities involved in order to offer residential local service in the Ameritech states. I am also the main point of contact to Ameritech for MCI's Mass Markets organization. In this capacity, I have worked extensively with Ameritech with respect to their OSS for all resale ordering activities. I have worked with Ameritech to conduct testing on a small scale for their manual ordering process as well as submitting orders through their EDI interface.

Q: PLEASE DESCRIBE YOUR EDUCATION AND RELEVANT BACKGROUND

A: I have a Bachelors of Business Administration from the College of William and Mary and a Masters of Management from the Kellogg School of Business at Northwestern University. Prior to working at MCI, I was employed by Andersen Consulting as a Senior Consultant to help develop and implement sophisticated automated business systems. While at Andersen, I worked on various development projects for MCI, which included all phases of the systems development life cycle; requirements definition, system design, system development and user acceptance testing. These projects included various functional areas including marketing, billing, network engineering and account receivable.

Q: HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS PROCEEDING?

A: No I have not.

Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A: The purpose of my testimony is to respond to Ameritech witnesses Rogers, Meixner and Kocher and their claims on the readiness of the RBOC's Operation Support Systems ("OSS"), used for the ordering, provisioning, maintaining and billing of resold service and unbundled network elements ("UNEs") by MCI and other CLECs.

Q: PLEASE SUMMARIZE YOUR TESTIMONY.

A: In short, I disagree with the broad and sweeping claims made by Ameritech that its

systems and associated documentation are sufficient to support CLEC entry into the local exchange market in Illinois. The new information provided in Ameritech's most recent testimony does not address the fundamental questions at issue in this proceeding, including: (i) whether Ameritech's OSS systems provide predictable and consistent results on a scalable basis for all functions required by the 1996 Telecommunications Act and the FCC Order; (ii) whether Ameritech provides sufficient documentation so that a CLEC may utilize the functionality that is supported.

Q: ARE YOU AWARE OF THE RECENT INVESTIGATION INTO THE READINESS OF AMERITECH'S OSS BY THE PUBLIC SERVICE COMMISSION OF WISCONSIN?

A: Yes. As the Illinois Commission may be aware, the Public Service Commission of Wisconsin has also been investigating the viability of Ameritech's OSS systems. I was participant in the Wisconsin hearings, conducted from 3/31 through 4/3. What was especially significant about the Wisconsin proceeding was that Commissioners themselves presided over the OSS portions of these hearings, actually questioning the witnesses in some instances. And as this Commission may be aware, on April 3, 1997, the PSC of Wisconsin concluded that Ameritech had failed to carry its burden to demonstrate the readiness its OSS. My understanding of the Wisconsin PSC's ruling is that it concluded that Ameritech's OSS do not yet support all required functionality, that Ameritech overly relies on manual processes, and that system defects remain, including

defects which would affect end users. Although a final written order is not yet available from that proceeding, a transcript of the oral comments of the Wisconsin Commissioners is attached to my testimony as Attachment I.

Q: WHAT HAS MCI'S EXPERIENCE BEEN TO DATE WITH AMERITECH'S OSS SYSTEMS?

A: MCI has been disappointed in its early attempts to utilize the EDI ordering systems and other aspects of Ameritech's OSS. In an early round of live test orders, approximately 30% of the orders errored out initially. In addition, it should be understood that these initial orders were among the most simple that Ameritech will face: resold "plain old telephone service" ("POTS"). In my opinion, these numbers and percentages are not the entire story.

Q: PLEASE EXPLAIN.

A: I strongly encourage this Commission to look beyond the raw percentage data of complete and rejected orders and focus on some of the specific problems encountered in MCI's initial attempts to use Ameritech's interfaces. At the same time, I caution the Commission not to look only to the discrete problems identified in my testimony to determine whether or not Ameritech's systems are fully tested and operational. In other words, the Commission should reject any argument by Ameritech that once these specific errors are cured, that no other errors will remain. My examples are by no means a complete catalog of the deficiencies of Ameritech's systems. Instead, I offer these

anecdotes as strong evidence that additional problems will be uncovered as the full functionality of these systems, as well as Ameritech's back-office procedures are put to the test, especially as CLECs begin to order products that are more complicated to process than resold POTS. Ameritech has been arguing for months before various regulators that its OSS systems are fully tested, operational and support all needed functionality. That significant problems remained in these systems during this period (and continue today) casts strong doubt on the reliability of Ameritech's internal testing, as well as its working definition of fully tested and operational.

Q: PLEASE PROVIDE AN EXAMPLE OF A PROBLEM ENCOUNTERED IN ORDERING RESOLD POTS.

A: As I testified before the PSC of Wisconsin, through MCI's early testing of the resale ordering system, we have discovered that in some cases Ameritech notified us that specific orders were complete before the work was actually completed. In some of these cases, Ameritech notified MCI that an order that had actually been rejected was instead complete.

As Ameritech has explained the design of its system to me, there are two major steps involved with a resale order; the "ordering piece" and the "drop to billing piece." The ordering piece performs all of work that needs to be done at the switch (if any). The billing piece changes the billing name of the account and makes the end-user account invisible to the retail side of Ameritech. Ameritech gives us a "complete" once the

ordering piece is done, without waiting until the order has successfully navigated the change in Ameritech's billing systems. As we found out with our testing, orders have errored out in the drop to billing procedure, after MCI was notified that the job was successful and complete. MCI was never made aware of the subsequent error at the billing change stage. Why does this concern me? In this situation, both companies think the customer belongs to them. The retail side of Ameritech has full visibility to the customer's account and has no idea that the customer now belongs to someone else. The customer could potentially receives bills from both companies for the same period of time. This will create confusion on the part of the customer and an increase in customer service calls to MCI. To me, this signals a significant design flaw in Ameritech's system if an error that is not detected until further down in the process can cause a customer to be billed by multiple carriers.

Q: YOU INDICATED THAT YOU TESTIFIED ABOUT THIS PROBLEM IN THE WISCONSIN PROCEEDING. HAS AMERITECH SINCE ADDRESSED THIS ISSUE?

A: Not to MCI's satisfaction. Ameritech has informed me that they are in the process of identifying and eliminating the specific problem that caused these orders to error out in the "drop to billing" phase of Ameritech's business process. It certainly represents progress that Ameritech is seemingly close to addressing the specific problem in its systems that caused these particular orders to error out after the work was done at the switch. However, Ameritech remains unwilling to address what I view as being a more

fundamental design flaw in its system, i.e., Ameritech still refuses to wait before sending a "complete" notice until after the order has successfully been changed in the Ameritech billing system. Thus, if a new problem is subsequently causes orders to again error out during the "drop to billing" piece for a different reason, Ameritech would continue to send its "complete" notification, even though the order did not successfully complete. As explained above, this design defect, which Ameritech now explicitly refuses to remedy, could cause a customer to be visible to be visible to both Ameritech and to a CLEC, resulting in the potential for such customer to be billed by both companies.

Q: ARE YOU AWARE OF WHAT THE SPECIFIC PROBLEM IS THAT AMERITECH HAS IDENTIFIED AS CAUSING THESE PREVIOUS ORDERS TO ERROR OUT DURING THE "DROP TO BILLING"?

A: No I am not. This concerns me for another reason. MCI, and to my knowledge, AT&T have pressed Ameritech for information as to why various orders are erroring out, or alternatively dropping to manual processing once received by Ameritech. To date, Ameritech has been slow in providing such information. Ameritech has apparently taken the position that what happens on its end of the interface is of no concern to CLECs. This attitude is troubling to MCI because it is important that the parties work cooperatively to reduce the number of orders that error out altogether, or which require significant manual processing.

Q: YOU MENTION MANUAL PROCESSING. WHY SHOULD A CLEC BE

CONCERNED WITH THE LEVEL OF MANUAL PROCESSING ON AMERITECH'S SIDE OF THE INTERFACE? ISN'T THAT SOLELY AMERITECH'S CONCERN?

A: There are several reasons that a CLEC should be concerned about the level of manual processing required at Ameritech's end of the interface. Manual access arrangements are simply not compatible with MCI's needs as a new entrant seeking to compete against an entrenched incumbent. Every manual intervention causes delay, sometimes substantial, and creates significant risk of error. By relying upon manual interventions, Ameritech can hold its competitors hostage to its own response time, hours of operation, and ability (or incentive) to provide accurate information. Also, manual arrangements increase CLECs' costs in two ways: CLECs must employ more people to handle the process and to audit Ameritech's performance; and Ameritech will try to pass its own inflated costs through to the CLECs. Accordingly, solutions that require manual intervention on Ameritech's side cannot be acceptable in either the short or long term.

In addition, reducing the level of manual intervention required by Ameritech should result in a reduction in the possibility of human error affecting these orders. As the PSC of Wisconsin found, there is a statistically-significant correlation between manual processing at Ameritech's end and missed installation due dates.

Q: DO YOU HAVE ANY FURTHER ANECDOTAL EVIDENCE OF PROBLEMS THAT REMAIN IN AMERITECH'S OSS SYSTEMS WHICH MAY IMPACT END USER CUSTOMERS?

A: Yes. One of our test customers lost dial tone on Friday 3/21. The customer was able to dial into Ameritech's automated 611 repair system and was able to open a trouble ticket with Ameritech, despite the fact that this was an MCI customer and the system was supposed to immediately kick out such complaint. Ameritech's 611 system was unable to recognize that this was a resold account. The trouble ticket was reviewed later in the day by Ameritech personnel who finally determined that the account was for an MCI resale customer. Ameritech called the MCI customer back to inform him that he must open a trouble ticket with MCI. MCI's trouble handling group then sent a trouble ticket to Ameritech on Friday. Ameritech has since advised us that they do not have a record of the Friday trouble ticket number sent by MCI. I believe that this may be because the Ameritech systems have no visibility to a trouble ticket once it has been closed. Ameritech has been able to find a subsequent trouble ticket that was sent for this customer on Monday, 3/24. Service was finally restored to this customer on 3/26, i.e., five days after the customer initially reported the outage.

After this problem was brought to Ameritech's attention, it informed MCI that it has since changed their system so that if a resold customer calls into 611, that when the customer's phone number is entered, it will immediately be told that they are a resold customer. Despite Ameritech's representations, as of 4/21/97, an MCI resale customer was still able to access Ameritech's 611 system.

I have every reason to presume that Ameritech will eventually be able to eliminate this

specific bug in its repair and maintenance systems. However, it illustrates a broader point: this is just another instance of a problem that was uncovered only after MCI started sending live customers through. This error was not discovered during Ameritech's own internal testing process.

Q: HAVE YOU DISCOVERED ANY OTHER PROBLEMS DURING YOUR TEST OF AMERITECH'S RESALE ORDERING SYSTEM?

A: Yes. Other troubling errors have occurred even with orders that Ameritech deems complete. For example, in a number of migration orders (i.e., transferring an existing Ameritech customer to MCI), certain features on such customers' accounts were unexplainedly dropped. In addition, other features were mysteriously added. This type of error is especially tricky to discover because it may not show up until a bill is generated and audited. In the meantime, MCI and the end-user customer will have been notified by Ameritech that the order was successfully processed. Once transactions are flowing at full volumes, such errors will be extremely difficult to track and correct.

Q: IN MR. MEIXNER'S TESTIMONY HE SUGGESTS THAT THE MAJORITY OF PROBLEMS EXPERIENCED BY CLECS ARE NOT DUE TO DESIGN FLAWS ON AMERITECH'S SIDE OF THE INTERFACE, BUT ARE RATHER DUE TO ERRORS BY THE CLEC, FOR EXAMPLE, IN INVALID DATA IN EDI ORDERS (page 11). DO YOU AGREE?

A: Hardly. One of the most fundamental design flaws in Ameritech's system is its fragility,

i.e., its intolerance for errors, but worse, in the poor design and inability for Ameritech's systems to recognize errors on either side.

Ameritech's systems are really deficient in their ability to detect and respond to any problems. During an early technical trial, one MCI order took 3 weeks to fully make it through Ameritech's system, and worse, Ameritech did not know that the order had errored out until we told them. Similarly, one of our employee test orders, which Ameritech had given a 2/20 complete date, had yet to be properly completed, at least as of 3/28. Again, we had to inform Ameritech that the order did not truly complete within their system, despite their erroneous completion notice.

In considering the key question of commercial readiness, the Commission should keep in mind that while MCI has been able to track this relatively small amount of POTS orders during testing, despite the defects in Ameritech's systems, it will be next to impossible for any CLEC to keep ahead of false "complete" reports from Ameritech, as well as other problems, once volumes reach any commercially significant level and once the orders become more complicated.

Q: YOU HAVE OFFERED TESTIMONY ON THE LACK OF VIABILITY OF AMERITECH'S RESALE OSS SYSTEMS. WHAT IS YOUR RESPONSE TO MR. ROGERS ASSESSMENT OF AMERITECH'S OSS SYSTEMS FOR THE ORDERING

AND PROVISIONING OF UNEs (page 3)?

A: ASR is an interface designed to enable IXCs (and CAPs) to order access arrangements from the LECs. As an interface for ordering unbundled loops, ASR is not in accordance with industry guidelines, which specify EDI formats. As such, Ameritech's decision to deploy ASR for this function is inconsistent with its own previous acknowledgment that "[t]he ability to do business between multiple local exchange carriers and incumbent LECs dictates that . . . electronic interfaces adhere to national or industry-based standards where available."[1]

It is certainly not the case that it is appropriate to use for a particular function a standard interface developed and approved for a different function. For one thing, Ameritech imposes an approximately $50 tariffed charge for every ASR it processes. This so-called "Administrative Fee" is exorbitant and serves as a transactional penalty. Far more importantly, Ameritech's decision to use different interfaces for different pieces of what should be single transactions greatly exacerbates the burdens faced by the CLEC. In particular, separating the ordering process for loops and unbundled local switching between two separate and distinct ordering systems will require duplicate work to combine a single loop and a single switch port just to provide basic phone service. Furthermore, at present CLECs must submit orders for service disconnect and for interim

[1] Ameritech July 10 Ex Parte, at 5, quoted in Local Competition Order ¶ 513.

local number portability ("ILNP") -- both of which are usually required in any order for unbundled loops -- by fax. This fragmentation of ordering processes is as unnecessary as it is onerous. The industry forums have defined the requirements for a mechanized LSR to be used with the EDI interface that accommodates (among other things) the ability to order unbundled loops, switches, service disconnect and ILNP together. This is the industry standard solution Ameritech should use.

Q: HAS MCI TESTED AMERITECH'S ABILITY TO PROCESS REQUESTS FOR UNBUNDLED LOOPS?

A: Although MCI has run unbundled loop trials with Ameritech, we have not used its ASR interface for reasons that underscore why Ameritech's proposed solution is wholly inadequate. MCI is gearing up to offer local service in many states at once and it is simply too expensive and burdensome for MCI to develop the capability to use nonstandard interfaces in all of these states. This is especially true because the fragmentation of Ameritech's ordering process ensures that MCI would realize little benefit were we to make the efforts necessary to use Ameritech's ASR. Because we would still have to fax orders for disconnect and ILNP, it is almost irrelevant whether we fax the order for the unbundled loop itself or send that order via a (nonstandard) automated interface. MCI, like any CLEC, requires an automated solution that accommodates all discrete pieces that are involved in the provision of service via unbundled elements because that whole transaction is only as efficient as the efficiency of its weakest part. It should be understood that the weakest link in Ameritech's loop

ordering process is significantly so.

Q: WHAT IS YOUR ASSESSMENT OF AMERITECH'S PROVISIONING INTERFACES FOR UNES?

A: Provisioning involves the exchange of information between carriers in which one executes a request for a set of products or services from the other with attendant acknowledgments and status reports. There are three provisioning sub-functions, i.e., three types of reports the provisioning Ameritech must communicate to the requesting CLEC: firm order confirmation, change in order status, and order completion. Ameritech uses the ASR interface for firm order confirmation but does not employ -- and apparently does not even intend to employ -- any form of automated interface for the other two sub-functions. This is totally unsatisfactory.

In other proceedings, Ameritech has generally asserted that there is no need for a mechanized interface for order status and order completion when provisioning UNEs because most unbundled loop orders are coordinated with the requesting carrier. This argument is nothing less than absurd. Customers demand prompt and accurate information regarding the timely provision of telecommunications services. Consequently, CLECs like MCI require a mechanized interface for both resold and unbundled services in order to provide timely and up-to-date information regarding the status, potential delay, and final completion of the provision of these services. Relying on the Ameritech to provide the necessary information manually is not acceptable.

Indeed, the fact that Ameritech does offer an EDI interface for these subfunctions in the resale context only underscores the inappropriateness of their refusal to do the same for ordering of unbundled elements.

Q: PLEASE SHARE YOUR THOUGHTS AS TO WHY AMERITECH'S OSS SYSTEMS ARE NOT YET FULLY OPERATIONAL.

A: Although it is a trite expression, the oft-spoken claim that "the devil is in the details" applies here. As one recent industry publication put it, "OSS includes everything that runs or monitors the network, such as trouble reporting or billing systems, but is not actually the network itself."[2] Stated otherwise, OSS consists of all the computerized and automated systems, together with associated business processes, that ensure the carrier can satisfy customer needs and expectations. This bears repeating: OSS is more than a series of interfaces. The most sophisticated graphical interfaces with pull-down menus are worth little if there are insufficient business processes behind the interfaces. Even through its limited testing, MCI has found that significant details remain unresolved.

OSS is not just about inter-carrier interfaces. To the contrary, Ameritech and other ILECs must, and do, have advanced OSS capabilities simply to run their internal operations that have nothing do with the particular LEC's relationship to other carriers. Some of these processes will work essentially the same way whether the function at issue

[2] Ed Feingold, Making Sense of OSS, Billing World, Jan. 1997, at 21, 22.

is performed for an end-user or a CLEC. For example, when a customer orders new service from a reseller that requires a line to be turned up, the reseller basically stands in the shoes of Ameritech: if the interfaces between the two carriers work as they should, the fact that the pre-ordering and ordering processes are mediated through a new carrier (the CLEC) should not add additional complication to Ameritech's existing provisioning systems. That is, the provisioning function itself should look much the same regardless whether the end-user takes that service directly from Ameritech or from a reseller of the BOC's service.

But there are other ways in which the new CLEC-ILEC dynamic does impose new requirements on Ameritech's downstream systems. For example, when a CLEC resells an existing service to an existing Ameritech customer, the processing of that order requires a communication between the ILEC's ordering and billing systems that Ameritech does not otherwise engage in for itself. In other words, the entire phenomenon of migrating an existing line with existing vertical services is one that the Ameritech did not perform in a pre-resale world. Similarly, when a CLEC orders unbundled elements, the new challenge for Ameritech is not only to receive and understand that order (this is where the ordering interfaces come in), but also to carry out that order. Before the 1996 Act, the ILECs did not have OSS systems in place to effectuate the unbundling of, say, local switching.

Q: WHAT ABOUT THE LATEST 6-VOLUME SET OF ORDERING GUIDES

PROVIDED TO MCI BY AMERITECH? DO THESE VOLUMES PROVIDE ALL THE "DETAILS" THAT BEDEVIL CLECs?

A: Unfortunately, I suspect that the latest set of binders will not address all of the information that MCI and other CLECs will need to successfully utilize Ameritech's OSS systems. Much of the information contained in these volumes has never been shared before. MCI will need more time to study the guides in depth before any intelligent assessment can be made.

Based on MCI's initial review of these guides, there is still insufficient and incomplete information on the logic and order flow design of Ameritech's business processes, as well as the business rules. In conversations with Ameritech personnel, MCI has been informed that this information will be forthcoming eventually, but that it is not yet available for delivery, either in hard copy or on Ameritech's Web Page.. Such information, resident in the Ameritech personnel who have years of experience in using Ameritech's own internal OSS systems, is critical for the proper use of the CLEC side of the interfaces, especially with respect to more complicated orders.

For these reasons, I strongly urge the Illinois Commission not to be distracted by the sheer volume of information presented in the new guides, but to assess whether this information is relevant and sufficient to support CLEC entry.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. This concludes my testimony at this time.

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Transcript from Open Commission Meeting on 04/03/97

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Any inaudible areas are recreated using notes and denoted through the use of italics.

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Meeting Start: 11:00 a.m.

Commission Chairperson Parrino joined the meeting by phone. Commissioners Mettner and Eastman were in attendance.

EASTMAN: This will bring the open meeting for Thursday, April 3rd, 1997, *to order*. Could I have information on the minutes?

THE CLERK: On the minutes for Thursday, March 13th, on page two, under Item 1 A, the word "deregulation" will be changed to "competition", excuse me. The next paragraph will be changed to read "The Commission determined the following guidelines should be used to determine when a market can be deregulated." We're going to add a subparagraph six, which reads "The Commission determined that the application of the guidelines will be evaluated in the context of the specific facts."

On Page 3, under subparagraph E, second to the bottom line, we're going to delete the words, "on exception to the standard basis."

On Page 4, under subparagraph B after the words "certified", we're going to put "or registered" And, after the words "certification", we're going to put "or registration."

On Page 5, the second full paragraph, the third line down, we're going to delete the words "within six months of the implementation of the work group discussions".

On Page 7, after subparagraph three, we're going to delete the last part of that sentence and change it to read, "and noted that universal service in the context of the gas industry does not meet availability statewide".

On Page 10, subparagraph H, we're going to delete the first part of the second line, which reads "unless the LDC is providing terrible service".

And on Page 11, excuse me, subparagraph M, that'll be changed to read, "The commission determined that it was not in a position to unbundle LDC services, but it is an issue that needs to be reviewed."

Under 7-B, after however, we're going to add, "a properly designed pilot is still a possibility, and is not exclusively a work group issue."

And on the minutes for Tuesday, March 25th, under subparagraph 1, we're going to add on the third line, "specified in the WGC February 4, 1997, request".

And there are no other changes or corrections that I'm aware of.

COMMISSIONER PARRINO: I would then move for the adoption of the minutes of March 13th and March 22nd.

COMMISSIONER METTNER: I'll second.

COMMISSIONER EASTMAN: All those in favor say I.

COMMISSIONER METTNER: I.

COMMISSIONER PARRINO: I.

COMMISSIONER EASTMAN: Motion carried.

Could I have information on notices and orders.

THE CLERK: The commissioners have reviewed the proposed notice and orders and have indicated no objection to notice Number 1 and order Number 2 will be laid over.

COMMISSIONER PARRINO: I would move then for the adoption of notice Number 1.

COMMISSIONER METTNER: I'll second.

COMMISSIONER EASTMAN: All those in favor say I.

COMMISSIONER PARRINO: I.

COMMISSIONER METTNER: I.

COMMISSIONER EASTMAN: Motion carried. Okay, then could I have information on the agenda for today.

THE CLERK: The commissions have reviewed the agenda and there are no changes to the suggested minute for three and four and, there is no additional information on items six and seven.

COMMISSIONER PARRINO: I'd move then for the adoption of the

suggested minutes for items three and four.

COMMISSIONER METTNER: I'll second.

COMMISSIONER EASTMAN: All those in favor signify by saying I.

COMMISSIONER EASTMAN: I.

COMMISSIONER PARRINO: I.

COMMISSIONER EASTMAN: Okay, is there any miscellaneous business on the agenda.

THE CLERK: No miscellaneous business.

COMMISSIONER EASTMAN: Okay, then we move to Item Number five, Matters relating to the Satisfaction of Conditions for Offering InterLATA Service in Wisconsin.

COMMISSIONER PARRINO: Do you want me to lead off?

COMMISSIONER EASTMAN: Sure, Cheryl.

COMMISSIONER PARRINO: Maybe we should talk a little bit about how we wanted to approach this. I have at least laid out my thoughts and I've got five general categories, and I'll see if that's okay with you.

The first category would be what are the standards for review and working through those.

The second category would be what I call an analysis of the record and what did the record tell us about these issues.

Third, I would go to what I call findings. Is the operations system support tested and operational, and do competitors have nondiscriminatory access to the system and do *CLECs* have access to interface design specifications.

The fourth category I'd like to specifically address are the issues that Mr. Dawson raised in his oral arguments as well as what he called *(inaudible)*.

And, the fifth, is any next steps.

Does that sound like an okay framework?

COMMISSIONER EASTMAN: That's fine with me.

COMMISSIONER METTNER: Yeah, I can work with that.

COMMISSIONER PARRINO: Okay, and it'd be my preference if we would at least try to take a break between each one of those sections.

As far as standards for review, *(This section references the Statement of Generally Available Terms and Conditions (SGAT))*. I first went to Section 252, Sub F, Sub 1, which talks about a Bell operating company's ability to file a statement of terms and conditions that such company generally offers within that state to comply with the requirements of Section 251 and the regulations thereunder. Section 252, Sub F, Sub 2, provided directions to the state commission with regard to approval, and that section says that a state commission may not approve such statement unless the statement complies with subsection D